

In the Drawings:

Attached hereto are Replacement Sheets 5/12, 7/12, 8/12 and 10/12 in which Figures 9B, 9D, 10 and 11B are revised to better distinguish between: (i) mat panels **35A** with two holes along one edge (both mats in Figure 9B and the lower mat in Figure 9D), (ii) mat panels **35** with a hole at each corner (the top two mats in Figure 9D); and (iii) mat panels **35B** with many holes (Figures 10 and 11B). As noted below, Applicant's specification is being amended to conform to these same drawing changes. In addition, an errant double line for mat 35A in Figure 9D (running vertically in the top view square of upper members 10) was detected and removed in that Replacement Sheet 7/12. Finally, a horizontal bracket was added to Figure 11B, at the bottom of Replacement Sheet 10/12 for addressing the Examiner's comment on page 3 of the Office Action.

Remarks/Arguments

Drawings

The Examiner objected to Applicant's drawings under 35 CFR 1.83(a) for failing to show every feature in claims 6, 9, 10 and 13-15. The Applicant respectfully submits that this objection is now moot in view of the cancellation of those claims above.

The Examiner also objected to certain Figures in Applicant's drawings under 37 CFR 1.84(p)(4). In response, the Applicant has submitted corrected drawing sheets (copies of which are attached hereto), and Applicant submits that the corrected drawing sheets address and obviate the Examiner's concerns. In particular, Applicant has submitted Replacement Sheets 5/12, 7/12, 8/12 and 10/12 (and corrected Figures 9B, 9D, 10 and 11E within) to distinguish (i) mat models with two holes along one edge (Figures 9B and 9D), (ii) mat panels with holes at each corner (Figure 9D), and (iii) a mat with many holes (Figures 10 and 11B). As discussed below, Applicant's specification also has been amended to confirm to these drawing changes. In the revised specification and replacement Figures 9B, 9D, 10 and 11B, alternate models of mats (with different hole locations and/or quantities) are given alternate mat designations 35A and 35B. In addition, an errant double line for mat 35A in Figure 9D (running vertically in the top view square of upper members 10) was also detected and removed in that particular Replacement Sheet.

Finally, a horizontal bracket was added to the bottom of Replacement Sheet 11B consistent with the Examiner's comment on page 3 of the Office Action (and pursuant to clarification provided by the Examiner to an associate for the undersigned in a telephone call with the Examiner on September 7, 2007).

With the filing of Replacement Sheets for Applicant's Figures 9B, 9D, 10 and 11B, it is respectfully submitted that all drawing objections have been addressed and overcome.

Specification

Applicant has amended his specification to conform to the drawing correction and Replacement Sheets described above.

Abstract

Applicant has amended his Abstract to conform to the comments by the Examiner on page 4 of the Office Action.

Claims

Section 112. The Examiner has objected to Claims 1 – 28 under 35 U.S.C. §112 as being indefinite. The Applicant submits that this objection has been mooted as to claims 1-15 because these claims have been canceled. In respect to independent claim 16, Applicant has also revised the beginning of claim 16 to address the method-system language discrepancy raised on page 6 of the first Office Action. It is respectfully submitted that with these amendments, independent claim 16 should now be in condition for allowance. As remaining claims 18-20 and 22-26 depend directly or indirectly from amended claim 16, and further narrow the scope of same, they should also be in condition for prompt allowance. As to the Examiner's §112 rejection of claim 25, in particular (set forth on page 6 of the Office Action), the Applicant has amended claim 25 to also the Examiner's stated concerns.

Double Patenting. The Applicant submits that the double patenting rejection of claim 30 (over claim 3) is also rendered moot with the aforementioned cancellation of claims 1-15 above.

Sections 102 and 103

As a preliminary matter, these remarks will not be addressing the claim rejections relating to canceled claims because of mootness. Such claims include the rejections to: (i) canceled claims 1-5 and 9-12 for anticipation by Parker U.S. Patent No. 487,374 (hereafter “Parker”); (ii) canceled claims 1-3, 11-12 and 15 for Section 102(b) anticipation by French patent No. 1,559,036 (hereafter “Dom”); (iii) canceled claims 1 and 6 for anticipation by Green U.S. Patent No. 4,610,250; (iv) canceled claims 1 and 9 for Section 102(e) anticipation by Johnson U.S. Patent No. 7,021,009; and (v) canceled claims 7, 8, 13, 14, 21 and 27 for obviousness under Section 103. By such cancellations, the Applicant does not concede the application of the cited prior art and, instead, has elected to pursue the amended claims discussed below

The Examiner has indicated, at pages 22 and 23 of the first Action, that dependent claims 17, 19 and 23 would be allowable over the cited art if the §112 rejections of these claims is overcome. In response, Applicant has amended claim 16 to address the Examiner’s 112 concerns and has incorporated the limitations of claim 17 into claim 16. Claims 19 and 23 have been amended to indicate that they now depend from claim 16 and are allowable as such for the reasons set forth by the Examiner. The Applicant submits further that, with the amendments to claim 16, the further claims depending therefrom should also be allowable. Specifically, claims 20, 22, 24 and 25 overcome their prior anticipation by Brown U.S. Patent No. 4,172,680 (hereafter “Brown”), claim 18 now overcomes the obviousness rejection over Brown in view of Atkinson U.S. Patent No. 5,988,942, and claim 26 overcomes the obviousness rejection over Brown.

The Examiner also rejected Applicant's two-prong connector claim (independent claim 29) for anticipation by Parker and Applicant's four-prong connector claim (independent claim 30) for anticipation by Dom. While disagreeing with the general characterizations of both Parker and Dom, Applicant has nevertheless amended claims 29 and 30 to still further distinguish over the cited art. Particularly, Applicant has added to claim 29 the limitation that the upper member of his two prong connector "rest on a top surface of adjacent first and second mat panels". Support for this language is found at page 4, line 10 of Applicant's specification as filed. Ignoring the 90 degree rotation of Parker's "Fence Stay", the closest thing to an upper member equivalent from Figure 3 of that patent still requires positioning fence wires "b" between that "upper member" and the two holes in the same fence stay of Parker Figure 3. Furthermore, Parker's staple "d" in that view keeps the fence wires joined to the stay. The staple does not flexibly connect adjacent mat panels, or any adjoining stays for that matter. As such, it is respectfully submitted that as amended above, Claim 29 sufficiently distinguishes over anything taught in, or suggested by, Parker.

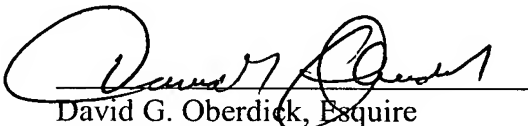
As for Applicant's claim 30 on his four-prong connector model, amendments above now more clearly point out how each of his four prongs extend into their own, assigned holes in two or more adjacent mat panels. That feature is shown in Applicant's Figures 9B through 9D, and described at page 11, lines 2-4 of his specification. It is not clear in what field(s) the clamp at Figure 5 of the Dom patent would be used. Figure 5 is but one of 11 clamp models shown. If one were to ignore the fact that Dom Figure 5 joins two sides of the same clamp, rather than two or more adjoining mat panels, it is still critical to point out how the four purported prongs (element 22 in Dom Figure 5) extend into just two (and not four, separate) dedicated prong

receivers. As amended above, therefore, Applicant's claim 30 should even more clearly distinguish over anything taught in, or suggested by, Dom.

Conclusion

The Applicant respectfully submits that his remaining claims, as amended, are in condition for allowance. They are not anticipated by, nor rendered obvious over, any teaching or suggestion the cited art summarized above. No new matter is presented by way of these claim amendments, or revisions to Applicant's specification and/or drawings. If claims 16, 18-20, 22-26 and 29-30 are not allowable for any reason, the Examiner is encouraged to contact Applicant's undersigned attorney at the direct dial number listed below.

Respectfully submitted,


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